

**IN THE UNITED STATES FEDERAL COURT FOR  
THE SOUTHERN DISTRICT OF TEXAS HOUSTON  
DIVISION**

**DALE WILKINSON,**

**Plaintiff,**

**vs.**

**HOWARD ANDREWS and  
LISA DIEHL GREGORY**

**Defendants.**

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**CASE NO. 4:24-cv-02685**

**DEFENDANTS' OBJECTION AND RESPONSES TO PLAINTIFF DALE WILKINSON'S  
FIRST INTEROGATORIES**

COME NOW, HOWARD ADNREWS and LISA DIEHL GREGORY, Defendants in the above captioned matter, files these their Responses to Plaintiff's Interrogatories.

Respectfully submitted,

/s/ T. Ernest Freeman

T. Ernest Freeman

**ATTORNEY IN CHARGE**

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ATTORNEYS FOR DEFENDANTS

HOWARD ANDREWS AND

LISA DIEHL GREGORY

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument was forwarded via electronic mail, e-filing, e-service and/or facsimile on January 10, 2025 to the all-known counsel of record.

/s/ T. Ernest Freeman

T. Ernest Freeman

**DEFENDANTS' OBJECTION AND RESPONSES TO PLAINTIFF DALE WILKINSON'S  
FIRST INTEROGATORIES**

1. What is the name and address of the person answering these interrogatories, and if applicable, the person's official position or relationship with the party to whom the interrogatories are directed?

**ANSWER:**

**Howard Andrews and Lisa Gregory, 15637 Marina Dr Unit 5 Montgomery TX 77356**

2. If your response to any of the allegations of the Plaintiff's Complaint was to deny said allegations, please give a full explanation why you have denied the allegations and reference any documentation that supports the denial.

**ANSWER:**

**Defendants deny all Plaintiff's claims because Defendant's vehicle is a matching numbers 1962 Corvette with extensive provenance and that has been authoritatively evaluated and judged numerous times. Defendants have no reason to believe that Plaintiff's vehicle properly bears the serial number found on Defendants' Corvette.**

3. Please identify the individual, entity, business and/or organization, from whom you bought Subject Vehicle 2. Please also disclose the price paid, the date of the sale and the condition and/or problems with the vehicle. Identify and describe all communications between you and any such person. If these communications are in writing, please consider this a request to produce them.

**ANSWER: Plaintiffs purchased their vehicle from Mecum Ausctions. When the vehicle was picked up car in Dallas, Plaintiffs found paint bubbles in fiberglass on the front of the vehicle**

**caused by oil contamination. In the course of repainting, it was discovered that that the vehicle needed a new fiberglass clip. The new clip was installed and the vehicle repainted.**

4. State in detail all circumstances regarding your purchase of Subject Vehicle 2 including all statements made by the seller or any agent of the seller regarding Subject Vehicle 2. If these communications are in writing, please consider this a request to produce them.

**ANSWER:**

**Plaintiffs purchased their vehicle via live online auction from Mecum Auctions. Plaintiffs have produced the online auction listing for Vehicle 2 as well as documentation of the sale.**

5. Please identify any and all individuals, employees, agents, business, entities or organizations that you contracted with or had dealings with to repair, restore or replace items on Subject Vehicle 2 at any point that it was in your ownership, custody or control. If any documents are identified please consider this a formal request to produce these items.

**ANSWER:**

**Restoration was completed by Gordon Andrus at Houston Corvette Services. Detailed invoices for this work has been produced.**

6. Identify of all communications by and between you and MECUM AUCTION, regarding either Subject Vehicle 1 or Subject Vehicle 2. List and identify the date of the communication, the party communicated with, the means used to communicate and the substance of the communication. If any written communications are identified, please consider this a formal request to produce these items.

**ANSWER:**

**The only written materials exchanged with Mecum Auctions are documents directly related to the purchase of Vehicle 2, which have been produced.**

7. Identify of all communications by and between you and the previous owner of Subject Vehicle 2. List and identify the date of the communication, the party communicated with, the means used to communicate and the substance of the communication. If any written communications are identified, please consider this a formal request to produce these items.

**ANSWER:**

**No responsive documents exist.**

8. Identify of all communications by and between you and any service that you have hired to repair, restore or otherwise perform labor on Subject Vehicle 2. List and identify the date of the communication, the party communicated with, the means used to communicate and the substance of the communication. If any written communications are identified, please consider this a formal request to produce these items.

**ANSWER:**

**Defendants object because this request is overly broad, unduly burdensome, and not reasonably calculated to discovery admissible evidence. Subject to and without waiving the foregoing objections, Defendants will produce detailed invoices identifying the restoration services performed by Houston Corvette Services.**

9. Identify documents, reports, notes, photographs, repair orders and/or receipts which describe, portray or include Subject Vehicle 2's condition during and before your ownership and/or

control, including all repairs authorized, completed or attempted by you or your agents which arose from or concern Subject Vehicle 2. If any documents, reports, notes, photographs, repair orders and/or receipts are identified please consider this a formal request to produce these items.

**ANSWER:**

**Defendants will produce detailed invoices identifying the restoration services performed by Houston Corvette Services.**

10. Please indicate how long you have owned or had possession of Subject Vehicle 2.

**ANSWER:**

**Since Sept 11, 2022**

11. Please identify any and all individuals, employees, agents, business, entities or organizations that you contracted with or had dealings with to verify the authenticity of the VIN of Subject Vehicle 2. If any documents are identified please consider this a formal request to produce these items

**ANSWER:**

**No one.**

12. Please identify any and all individuals, employees, agents, business, entities or organizations that you contracted with or had dealings with to verify the authenticity of the any part or component of Subject Vehicle 2. If any documents are identified please consider this a formal request to produce these items.

**ANSWER:**

**No one.**

13. Please state whether you have submitted Subject Vehicle 2 for judging by any Corvette club or authority, including, but not limited to the National Corvette Restorer's Society (NCRS) and Blooming Gold. If the response to this interrogatory is in the affirmative, please identify the Corvette club or authority, the judge who inspected Subject Vehicle 2, the date of the judging event and the results of the judging of Subject Vehicle 2.

**ANSWER:**

**Defendants have not** submitted Subject Vehicle 2 for judging by any Corvette club or authority.

14. If Subject Vehicle 2 was registered to be judged by any Corvette club or authority, including, but not limited to the National Corvette Restorer's Society (NCRS) and Blooming Gold, but was withdrawn from consideration, please identify the Corvette club or authority, the date of the judging event and the reasons for withdrawing Subject Vehicle 2 from consideration.

**ANSWER:**

**Defendant have no knowledge of such a withdrawal.**

15. If you contend anyone not a party hereto caused or contributed to the cause of action brought forth by the Plaintiff, state the identity of each such individual or entity and all of the facts in your possession or control in support thereof.

**ANSWER:**

**Defendants object to this interrogatory as vague and ambiguous. Subject to and without waiving this objection, Defendants have no reason to believe that any person other than the Plaintiff bears any responsibility for this lawsuit besides the Defendant.**

16. Where you ever a party to a criminal or civil legal or equitable action arising out of the purchase or sale of an automobile(s); if so, please state, the jurisdictional location of the action, the docket number of the action and the ultimate result of the action.

**ANSWER: NO**

17. State in detail all circumstances regarding any attempt you have made to sell Subject Vehicle 2 to any party, including all statements made by potential buyers to you regarding the Subject Vehicle 2 and inspection reports of Subject Vehicle 2. If these communications are in writing, please consider this a request to produce them.

**ANSWER: Defendants have not attempted to sell Subject Vehicle 2.**